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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91173105
Party	Plaintiff Honda Motor Co., Ltd.
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Submission	Motion to Extend
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Honda Motor Co. Ltd.,)	
)	
Opposer)	
)	
v.)	Opposition No. 91/173,105
)	
Michael Dalton,)	
)	
Applicant)	
)	

REPLY MEMORANDUM OF LAW IN SUPPORT OF HONDA’S
MOTION TO EXTEND TIME FOR TESTIMONY PERIOD

Opposer Honda Motor Co., Ltd. submits this reply in further support of its motion to extend the testimony period.

Applicant is incorrect regarding Opposer’s counsel of record. Dyan Finguerra-DuCharme was appointed by Opposer as an attorney of record in the Notice of Opposition filed on September 27, 2007. Ms. Finguerra-DuCharme also deposed Applicant during the discovery period. Furthermore, Applicant has communicated directly with Ms. Finguerra-DuCharme regarding other issues relating to this opposition. Therefore, Applicant is well-aware of Ms. Finguerra-DuCharme’s appearance on behalf of Honda and the role Ms. Finguerra-DuCharme has played since the proceedings resumed in February.¹

Unfortunately, Opposer’s claim of medical leave hindrance is real. For the better half of July, Ms. Finguerra-DuCharme was out of the office on medical disability because she underwent major abdominal surgery. This surgery affected counsel’s ability to prepare for Honda’s testimony period.

¹ While Cora Tung Han had previously appeared in this matter, her last day at the firm is today.

With respect to scheduling, Honda's testimony period opened on July 28, 2008. Honda's main witness had several pressing burdens and deadlines for the first half of August leaving only the third week of August for deposition (which is one week before the close of the testimony period). As such, an extension of time would allow the witness sufficient time to prepare for deposition and counsel sufficient time to prepare a Notice of Allowance.

Accordingly, Opposer hereby requests an extension of time of its testimony period.

Respectfully submitted,

WILMER CUTLER PICKERING
HALE AND DORR LLP

Date: August 15, 2008

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CERTIFICATE OF MAILING

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